



Preserving America's Heritage

August 12, 2009

Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration Region IX
201 Mission St., Suite 1650
San Francisco, CA 94105-1839

RE: *Honolulu High-Capacity Transit Corridor Project*
Honolulu, Hawaii

Dear Mr. Rogers:

On August 4, 2009, the Advisory Council on Historic Preservation (ACHP) participated in a teleconference to discuss the draft Programmatic Agreement (PA) for the referenced undertaking. The ACHP is actively participating in the Section 106 consultation process in accordance with 36 CFR §800.6(b)(2) of our regulations, "Protection of Historic Properties" (36 CFR Part 800). We offer the following comments on the consultation for this undertaking based on the teleconference and the meeting notes circulated afterwards by the City and County of Honolulu Department of Transportation Services (City).

FTA and the City should ensure that all consulting parties have access to relevant background information that informs the recent revisions made to the PA draft. This includes the *Design Pattern Guidebook* referenced in the preamble of the PA draft and any effect findings revised by FTA in response to comments provided by the Hawaii State Historic Preservation Officer (SHPO) and other consulting parties. Additional comments received by FTA and the City should be shared with all consulting parties to ensure that all have the opportunity to review subsequent historic preservation issues that may surface.

During a subsequent teleconference on August 11 with FTA staff, the applicant, and the Hawaii SHPO, we shared our observations regarding the Section 106 consultation for this undertaking. We understand that FTA and the City will provide additional information to all consulting parties about how the agency has considered avoidance, minimization, and mitigation measures brought forward by consulting parties. We also understand that FTA and the City will provide clarification about how cumulative effects on historic properties have been addressed for this undertaking.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

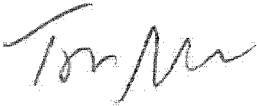
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The ACHP is enclosing general comments on the August 4 draft PA that should be addressed when the draft is revised. As you know, a number of issues raised have not yet been addressed by FTA. Accordingly, upon receipt of the additional information to be provided by FTA and the City and after review of any other consulting party comments on the draft, we will be able to continue our review of the PA.

We appreciate your consideration of the ACHP's recommendations, along with the comments of the Hawaii SHPO other consulting parties for this undertaking. If you have any questions, please contact Blythe Semmer at 202-606-8552 or via e-mail at bsemmer@achp.gov.

Sincerely,



2 Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing, and Assistance Section

Enclosure